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September 3, 2024

VIA ECF

Honorable Michael A. Hammer
United States District Court for the
District of New Jersey
Martin Luther King Courthouse
50 Walnut Street Room 2C
Newark, NJ 07101

**Re: *United States v. Matthew Goettsche, et al.*, 19-CR-877 (CCC)
Proposed Modification of Pretrial Release Order**

Dear Judge Hammer:

Please accept this letter in lieu of a more formal motion on behalf of Defendant Matthew Goettsche. We respectfully move to modify his third-party custodian condition to apply during his hours of restriction to the residence, *i.e.*, his curfew hours. The Court previously modified his hours of restriction to curfew as directed by Pretrial Services (Dkt. 355). Pretrial Services and the government, through AUSA Anthony Torntore, have no objection to this proposed request. Thank you in advance.

The Court's Order Setting Conditions of Release (Dkt. 171) requires Mr. Goettsche to remain under home incarceration and that he "shall remain in the presence of a third-party custodian at all times unless otherwise approved by Pretrial Services." The Court previously approved other consent bail modifications, including the third-party custodian conditions (Dkts. 187, 193, 196, 225, 229, 241, 252, 258, 262, 270, 274, 281, 283, 288, 290, 305, 311, 323, and 348). The Court previously denied a motion to modify bail conditions (Dkt. 268). The aforementioned proposed modification to third-party custodian condition to apply during curfew would not otherwise modify any other conditions as previously set forth or modified by this Court.

Very truly yours,

/s/ Rodney Villazor

Rodney Villazor, Esq.

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